

JUDGE FURMAN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YULIANA AVALOS, and others similarly  
situated,

Plaintiffs,

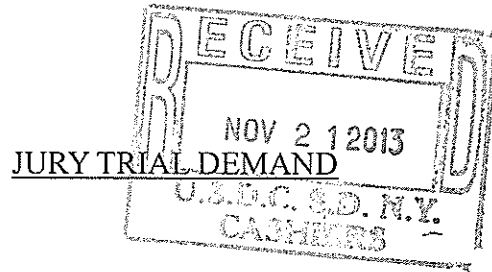
- versus -

IAC/INTERACTIVECORP., MATCH.COM,  
LLC, and PEOPLE MEDIA, LLC,

Defendants.

13 CV 8351 1

Case No.



**COMPLAINT**

Plaintiff Yuliana Avalos by her undersigned attorney, brings this action against Defendants. Plaintiff's allegations are based upon an extensive investigation that included: (1) reviewing hundreds of complaints from plaintiffs, class members, and other affected individuals and entities, (2) analysis of thousands of fraudulent profiles posted on Defendants' web sites, (3) consultations with experts throughout the United States in romance scams, statistics and pattern recognition, computer/internet technology, and photograph recognition software, (4) consultations with the nation's top class action attorneys and law firms. Plaintiffs believe that substantial evidence will exist for the allegations set forth herein after a reasonable opportunity for discovery.

**NATURE OF THE ACTION**

1. This action arises out of one of the biggest conspiracies ever executed on the internet.
2. Since at least 2007, Defendants have been engaged in large-scale violations of the Federal Lanham Act, violations of Civil RICO, Common Law Copyright Infringement, Common Law Fraud, violations of New York Civil Rights Law Sections 50 and 51, violations of New York

Business Law Sections 349 and 350, Negligence, and other unlawful conduct through their “Match Segment.”

3. Defendants’ illegal business practices center around the knowing and intentional unauthorized use of Plaintiff’s photographs in hundreds if not thousands of fraudulent profiles posted on several of the 25 dating sites owned and operated by the Defendants over the past six years, and the use of thousands if not millions of photographs of class members in fraudulent profiles on most if not all of Defendants’ sites during the same period.

4. While Defendants masquerade as the premiere dating site network in the United States, the reality is that a high percentage of profiles posted on Defendants’ dating sites are fraudulent profiles created by criminals (aka “scammers”) in international locations for criminal purposes that use the photographs of Plaintiff and other non-members of Defendants’ sites.

5. Defendants knowingly and intentionally conspire with criminals operating from locations including internet cafes in Nigeria, Ghana, and Russia, who manually and through the use of software and other computer devices, submit a high percentage of profiles on Defendants’ web sites incorporating photographs of Plaintiff and members of the class.

6. Defendants are aware of this as their computer servers in New York, Texas, and other locations in the United States, receive and approve fraudulent profiles by the thousands that “ping” from international IP addresses, which are the computer equivalent of area codes.

7. Furthermore, Defendants specifically approve, edit content, and post every profile, making these fake profiles created abroad available to consumers in the United States.

8. Plaintiff’s investigation has revealed that Defendants, its subsidiaries, joint venturers, and/or subcontractors, also create fake profiles on Defendants’ sites.

9. Attached as Exhibit "A" is a list of approximately 190 fake Match.com profiles in which Plaintiff's photographs are used without consent and a page from a profile including Plaintiff's photographs.

10. Fake Match.com New York profiles incorporating Plaintiff's photographs include but are not limited to the following: good\_real90 (New York, NY); grace6162 (Church Street, NY); girls\_12525 (Cathedral, NY); masaalina22000 (New York, NY); ActiveLady485 (Canal Street, NY); Genny\_2010 (Bronx, NY); brixx32 (New York, NY); sincere\_love1234 (New York, NY); real\_julie (Manhattan, NY); Huney\_cute (Manhattan, NY); NimbleLoversRock (New York, NY); Broadu\_313443 (Yonkers, NY); Genny\_2010 (Bronx, NY); mamalove00233 (Madison Square, NY); lilogifty0 (Manhattan, NY); sekking4u2 (New York, NY); hopelov123 (Cooper, NY); Huney\_cute (Manhattan, NY); lizzyrill10 (New York, NY); Lovers\_Heart12 (New York, NY); wow\_inas (Manhattan, NY); weddell2222 (New York, NY); SWEETLIZZYLOVE1 (New York, NY).

11. The following are 14 PeopleMedia.com profiles in which Plaintiff's photographs are used without consent: RepublicanPeopleMeet.com – SEEKINTRULUV0129; RepublicanPeopleMeet.com – LOVEISONE; JpeopleMeet.com – KATENEEDLOVE12; JpeopleMeet.com – LOVEMSWEET28; MarriageMindedPeopleMeet.com – SINGLELOVE123; DemocraticPeopleMeet.com – SEEKINTRULUV0129; CatholicPeopleMeet.com – LOLMARY69; CatholicPeopleMeet.com – JUSTONECAMILA; CatholicPeopleMeet.com – EASYPRETTY; DivorcedPeopleMeet.com – WHEREISMYLOVE99; LittlePeopleMeet.com – WITTYPAMELLA; LittlePeopleMeet.com – JOSEY111; LittlePeopleMeet.com – SINGLEALICE44, KATHIE280; LatinoPeopleMeet.com – LYNDAME333.

12. Additional fake People Media profiles incorporating photographs of class members include the following: LittlePeopleMeet.com: HEATBEAT, TRYKISS41, JENIFFERMORGAN82, SUSSYBRAIN, GOODSMILES, CHARLOTTE03, JULBROB, NOLIMIT4U, HOTASEVER2010, FRAGILEHEART09, NPNGAIN5, DORISLUV67, LOVELYKATHLEEN, USMARY31ATYAAHOO, JASMIN4LOVE, MGURL202, USDEAREST355, VIVAN1978, USUSFUNJOAN1954, REBUKE, LOVELINE01, EMELIADANIEL, USDEAREST355, SWEETDADA, USFUNJOAN1954, FUNHELLOCANWECHA, SWEETLOVE001FUN, CEECEELOVE, SEARCHINGHEAVEN, NICPEARL, CALLMESEXY21, DORISLOVE11, RUTH12, SUSSYBRAIN, ROBERTLIA33, DEBBIESEEKER0001, HELEND30001, DivorcedPeopleMeet.com: LONELYANN0710, ELOVETOME, USMARY31ATYAHOO, TRUELOVEWILD, PRINCESS1ZZZ, DANIELLEXXX, WMARY233ATYAAHO, SUREST123, FUNFAITH11, GRACEFULJET, FAITH2BOW555, SINGLEFAITH100, USLINDA97); CatholicPeopleMeet.com: JALL01, BRITTANYSEXY, LOVESEEKERS22, ANDREANMWATSON, ROSELYNSEALS, CANDYPOWELL, SPARSSHERRY, BAMMY401, WENDYLONELY; AsianPeopleMeet.com: SKJSAKS1, ANN10175, KENDRALOVELY, WMARY233ATYAH00, SEARCHINGHEAVEN, NATIVEBLOOM, SHAD333, RITABESSY1ATYAHU; RepublicanPeopleMeet.com: SPERDUTOD, LOVINGSOUL1114, KIM4YOU, SINGLESOUL01X; JpeopleMeet.com: ROSEGIRL4U, CARXX, SWEET09, BEAUTIFULELENA; MarriageMindedPeopleMeet.com: PRAY4JOY, PRICELESS23, ROSEPRETTY30, CYNFOGG1; DemocraticPeopleMeet.com: XMARY01ATYAH0, MARIANLOVEONE, CYNTHIAFOGG, SEEKINGLOVE111, TRUEBLUEGAL; SingleParentMeet.com: FUNRITACUTE123, ALICIACARSON, FUNTRACY00, PetPeopleMeet.com: IMAGINABLEFACE, CALISTER, LOVETH121;

InterracialPeopleMeet.com:LUV2DANC4FUN, SEXYLOVE25; ChinesePeopleMeet.com: WENDY51, PRECIOUSRITA,WHONEST; LatinoPeopleMeet.com: SWEETMARCH44, JENNIFER10, ELENADOC, LADECEPCIONADA; LDSPlantet.com: CROMEMILK, LAKERGAL,

13. Attached as exhibit “B” is a list of approximately 180 fake Match.com profiles including photographs of a class member who also appears in several of the People Media fake profiles listed above.

14. Attached as exhibit “C” is a list of approximately 165 fake Match.com profiles including photographs of a class member who also appears in several of the fake People Media profiles listed above.

15. Attached as exhibit “D” is a list of approximately 121 fake Match.com profiles including photographs of a class member who also appears in several of the fake People Media profiles listed above.

16. Attached as exhibit “E” is a list of approximately 103 fake Match.com profiles including photographs of a class member who also appears in several of the fake People Media profiles listed above.

17. Attached as exhibit “F” is a list of approximately 91 fake Match.com profiles including photographs of a class member who also appears in several of the fake People Media profiles listed above.

18. Attached as exhibit “G” is a list of approximately 164 fake Match.com profiles including photographs of a class member who also appears in several of the fake People Media profiles listed above.

19. Attached as exhibit “H” are a list of approximately 1,084 fake profiles that were created with computer software on Match.com. The text of all these profiles contains identical sentences with repeated misspellings rearranged and posted with different photographs of class members in different cities. Roughly half the member names contain sequential numbers at the end from 1 – 99, and each profile names obscure destinations under the title “Favorite Hot Spots.”

20. Attached as exhibit “I” are lists of approximately 997 fake Match.com profiles of Jane Does and John Does yet to be identified. These fake profiles are recognized through the repeated use of the same photographs in different profiles and recurring language and phrases in different profiles.

21. Hollywood celebrities are among those included in fake profiles on Match.com, including but not limited to: algo36, ready2goalready, jessica4366, bluesaphira67, and nihowmei.

22. Fake profiles also include photographs pirated from Facebook and modeling agencies, as well as photographs of military servicemen and women, all without the knowledge or consent of the individuals portrayed in the photographs.

23. Once profiles with these photographs are approved, they are used in Defendants' advertising, including daily emails to millions of subscribers and potential subscribers.

24. Unknown thousands or millions of Defendants' members subscribe to Defendants' web sites in the hope of meeting Plaintiff and members of the class, who are not and never were members of Defendants' web sites.

25. The tragedy of this case is two-fold as the American victims of internet fraud on Defendants' sites, (estimated to be at least thousands), mostly widows, widowers, and divorces

age 50 and over, have been defrauded out of as much as hundreds of millions of dollars over the past six-plus years through fraudulent dating profiles on Defendants' sites, and those of its competitors.

26. In addition to the financial and emotional toll, these scams destroy relationships, families, and result in suicides, abductions and murder of victims in foreign countries.

27. Since 2005, web sites including StopScammers.com, RomanceScam.com, RomanceScams.org, Internet-Love-Scams.org, 419.bittenus.com, etc. have been founded in an effort to stop or curb the proliferation of fraudulent activity occurring by and through fraudulent profiles on internet dating web sites.

28. These consumer assistance sites make available tens of thousands of photographs that are used in fraudulent profiles on Defendants' web sites, including photographs of Plaintiff and members of the class, which Defendants fail to use to screen unauthorized photographs from their sites.

29. Defendants could easily and inexpensively stop these illegal practices through the implementation of photograph recognition software which can scan billions of images nearly instantaneously to maintain the integrity of Defendants' web sites, through IP address screening of international IP addresses, and through manual and software screening of profiles that have "red flags," but Defendants refuse to do so as these fake profiles are a large part of what makes Defendants' match segment such a commercial success.

30. While previous consumer class actions and individual actions against Defendants have been previously dismissed, in those cases Plaintiffs were consumers who executed Terms of Use Agreements that absolved Defendants of liability – in the present case, Plaintiff and the class consist exclusively of non-members who are not subject to Defendants' "Terms of Use."

31. Plaintiff seeks to obtain equitable relief in the form of an order requiring Defendants to screen international IP addresses from posting domestic profiles in the United States, requiring Defendants to implement photograph and facial recognition software to effectively screen all photographs on their sites, ceasing the use of Plaintiff's photographs and those of class members, as well as statutory damages, compensatory damages, treble damages, punitive damages, plus interest, costs, and attorneys' fees.

### **JURISDICTION AND VENUE**

32. This Court has jurisdiction pursuant to Section 43(a) of the Federal Lanham Act , Civil RICO under 18 U.S.C. Sec. 1962, pursuant to 28 U.S.C. Sec. 1331 (federal question), as well as the Class Action Fairness Act as there are more than 100 class members and damages exceed \$5 million.

33. This court has personal jurisdiction over Defendants pursuant to 28 U.S.C. Sec. 1391(b)(2), as (a) a substantial portion of the wrongdoing alleged in this complaint took place in the State of New York; (b) Defendants masterminded and perpetrated the unlawful conduct complained of herein, primarily, within New York from Defendants corporate office in Chelsea; (c) Defendants unlawful conduct complained of herein causes injury, in part, within New York; (d) Defendants regularly conduct and solicit business within New York; (e) Defendants engage in other persistent courses of conduct and derive substantial revenue from goods and services used or consumed within New York; (f) Defendants regularly and systematically directs electronic activity within New York and manifest intent of engaging in business with New York; (g) evidence of Defendants' wrongdoing is present in the State of New York; (h) Plaintiff's likeness and image appears in fraudulent profiles posted in the State of New York; (i) Defendants are authorized to do business here, have sufficient minimum contacts with this state, and otherwise



intentionally availed themselves of the markets in this state through the promotion, marketing, and sale of its products and services in this state, to render the exercise of jurisdiction permissible under traditional notions of fair play and substantial justice.

34. This court has supplemental jurisdiction over the State law claims asserted in this complaint pursuant to Title 18 U.S.C. Section 1367(a) as, “they are so related to claims in the action within such original jurisdiction that they form part of the same case or controversy...”

35. Venue is proper in New York under 28 U.S.C. Sec. 1391 (c) because Defendant IAC’s international corporate headquarters is located within this district at 555 18<sup>th</sup> Street, New York, New York (since April 6, 2007).

36. IAC has been registered with the New York Secretary of State since March 31, 2005 and IAC’s Registered Agent for service of process is National Registered Agents, Inc., Suite 501, 875 Avenue of the Americas, New York, NY 10001.

### **PARTIES**

37. Plaintiff Yuliana Avalos (“Yuliana”) is a resident of the State of Florida and is a model whose likeness and image have been used in hundreds/thousands of fraudulent profiles approved, posted, published, and disseminated on Defendants web sites without consent.

38. Defendant IAC/InterActiveCorp (“IAC”) is a publicly traded Delaware corporation with corporate headquarters in the City and County of New York since April 2007 and approximately 128 subsidiary companies, including co-defendants People Media, LLC (“People Media”) and Match.com, LLC (“Match”).

39. A subsidiary of IAC, People Media is a California limited liability company that operates approximately 23 online dating/personals web sites including, AsianPeopleMeet.com, BabyBoomerPeopleMeet.com, BBPeopleMeet.com, BlackBabyBoomerMeet.com,

BlackChristianPeopleMeet.com, BlackPeopleMeet.com, CatholicPeopleMeet.com  
Chemistry.com, ChinesePeopleMeet.com, DemocraticPeopleMeet.com,  
DivorcedPeopleMeet.com, IndiaMatch.com, InterracialPeopleMeet.com, JPeopleMeet.com,  
LatinoPeopleMeet.com, LDSPlanet.com, LittlePeopleMeet.com, LoveAndSeek.com Match.com,  
MarriageMindedPeopleMeet.com, OKCupid.com, PetPeopleMeet.com,  
RepublicanPeopleMeet.com, SeniorBlackPeopleMeet.com, SeniorPeopleMeet.com,  
Singlesnet.com, and SingleParentMeet.com.

40. A subsidiary of IAC, Defendant Match is a Texas limited liability company that operates the online dating/personals web sites Match.com and Chemistry.com.

41. IAC's "Match Segment," including all the Defendants and approximately 25 dating web sites, grosses approximately \$350 million per year (approximately \$2 billion during the class period), a significant portion of which is attributable to the unauthorized use of Plaintiff's photographs and members of the class.

#### **CLASS ACTION ALLEGATIONS**

42. The class is initially defined as all individuals or entities including models, United States military servicemen/women, celebrities, social networking users, and others whose likenesses and images as depicted in photographs, that were approved, posted, published and disseminated by Defendants' web sites without the permission or consent of the person depicted in such photographs, since November 21, 2007 (excluding Defendants' members/subscribers, as they are subject to restrictive Terms of Use agreements).

43. This action is properly maintainable as a class action.

44. The class is so numerous that joinder of all members is impracticable.

45. The number and identities of class members can be determined through various methods, including photograph identification software and other investigative techniques.

46. The disposition of their claims in a class action will be of benefit to the parties and the court.

47. A class action is superior to other methods for the fair and efficient adjudication of the claims herein asserted, and no unusual difficulties are likely to be encountered in the management of this action as a class action.

48. The likelihood of individual class members prosecuting separate claims is remote.

49. There is a well-defined community of interest in the questions of law and fact involved affecting members of the class. Among the questions of law and fact which are common to the class, and which predominate over questions affecting any individual class member are, the following:

(a) Whether Defendants violated the Lanham Act by approving, posting, publishing, and disseminating, and otherwise using thousands (and possibly as many as hundreds of thousands) of Plaintiff's photographs in Defendants' dating profiles, intentionally "passing off" these models and other non-members as subscribers or members of Defendants' web sites.

(b) Whether Defendants violated Civil RICO by intentionally creating, approving, posting, publishing, and disseminating thousands if not millions of fraudulent profiles on their web sites depicting the likenesses and images of Plaintiff and members of the class without consent.

(c) Whether Defendants committed Common Law Copyright infringement by approving, posting, publishing, and disseminating, thousands of fraudulent profiles

incorporating copyrighted photographs of Plaintiffs and the class for commercial purposes.

(d) Whether Defendants committed Common Law Fraud by intentionally approving, posting, publishing, and disseminating thousands if not millions of fraudulent profiles on their web sites depicting the likenesses and images of Plaintiffs and members of the class without consent.

(e) Whether Defendants violated New York Civil Rights Law Section 50 and 51 by approving and posting thousands of fraudulent dating profiles that incorporate the unauthorized use of Plaintiff's likeness and image, as well as thousands of other class members.

(f) Whether Defendants violated New York Business Law Section 349 as a result of their unfair and deceptive practices.

(g) Whether Defendants violated New York Business Law Section 350 as a result of their false advertising;

(h) Whether Defendants were negligent in approving and posting thousands if not millions of fraudulent profiles on its sites that include the likeness and image of Plaintiffs and members of the class.

(i) Whether Defendants' unlawful acts resulted in Unjust Enrichment to Defendants.

(j) Whether Defendants' acts were willful entitling Plaintiffs class to treble and/or punitive damages.

(k) Whether Plaintiffs and the class are entitled to injunctive relief requiring Defendants to implement photograph recognition software and foreign IP address screening, to stop these illegal business practices.

1. Plaintiff is a member of the class and is committed to prosecuting this action.
2. Plaintiff's claims are typical of the claims of the other members of the class.
3. Plaintiff does not have interests antagonistic to or in conflict with those they seek to represent. Plaintiff is, therefore, an adequate representative of the class.
4. The likelihood of individual class members prosecuting separate individual actions is remote due to the relatively small loss suffered by most class members as compared to the burden and expense of prosecuting litigation of this nature and magnitude. Absent a class action, Defendant is likely to avoid liability for its wrongdoing, and the class members are unlikely to obtain redress for the wrongs alleged herein.
5. Adjudication of this case on a class-wide basis is manageable by this court.

#### **FACTUAL ALLEGATIONS**

6. Defendants own and operate and have derived billions of dollars in gross revenue through subscription fees and advertising, from approximately 25 dating/personal web sites over the past 6 years, including Match.com, Chemistry.com, Singlesnet.com, AsianPeopleMeet.com, BabyBoomerPeopleMeet.com, BBPeopleMeet.com, BlackBabyBoomerMeet.com, BlackChristianPeopleMeet.com, BlackPeopleMeet.com, CatholicPeopleMeet.com, Chemistry.com, ChinesePeopleMeet.com, DemocraticPeopleMeet.com, DivorcedPeopleMeet.com, IndiaMatch.com, InterracialPeopleMeet.com, JPeopleMeet.com, LatinoPeopleMeet.com, LDSPlanet.com, LittlePeopleMeet.com, LoveAndSeek.com Match.com, MarriageMindedPeopleMeet.com, OKCupid.com, PetPeopleMeet.com,

RepublicanPeopleMeet.com, SeniorBlackPeopleMeet.com, SeniorPeopleMeet.com, Singlesnet.com, and SingleParentMeet.com.

7. All of these web sites incorporate IAC intellectual property, including patents, trademarks, and copyrights, as well as IAC hardware, software, and other computer systems, and generate revenue for its parent company, IAC.

8. IAC's sites advertise and promote for commercial purposes, IAC's subsidiary and partner companies, including, Expedia.com, Hotwire.com, etc and obtain substantial revenue by the cross-promotion of these sites through it's "Match Segment."

9. While Defendants' sites presumably provide a legitimate forum for American citizens in the 50 states to meet new people for dating, relationships, and marriage, the truth is that a large percentage of profiles on these sites are fraudulent profiles posted by con-artists or scammers from international locations for illegal purposes, using the photographs of Plaintiff and members of the class without permission or consent.

10. According to IAC's annual reports, these sites jointly constitute the "Match Segment" of IAC, which grosses approximately \$350 million per year for IAC; in all Defendants have grossed approximately \$2 billion in the "Match Segment" during the class period.

11. Since at least November, 2007, Defendants' online dating/personals web sites have been inundated with fraudulent profiles created by individuals operating from computers with IP addresses outside the United States.

12. Defendants claim to have millions of members on their web sites, and claim to have 20,000 new members joining daily, but in fact, a large percentage of profiles posted on Defendants' web sites are fake or fraudulent profiles incorporating the likeness and image of Plaintiff and members of the class without consent.

13. Defendants have failed to use reasonable care with regard to the implementation of photograph and facial recognition software, which could easily and inexpensively screen unauthorized photographs of Plaintiffs and members of the class from being used on Defendants' web sites.

14. Defendants have failed to use reasonable care in the manual approval process of profiles that contain the likenesses and images of Plaintiffs and members of the class, over and over again in profiles that are obviously fake or fraudulent.

15. Defendants have failed to respond promptly, and in many cases have not responded at all, to complaints regarding fake or fraudulent profiles incorporating the likenesses and images of Plaintiffs and members of the class.

16. Defendants have failed to take legal action against the criminals who have openly operated on their web sites since at least November 21, 2007.

17. Examples of fake profiles include those in Exhibits "A" - "I" attached hereto, approximately 3,000 in all.

18. As a result of the foregoing, Defendants since at least November 21, 2007, have been engaged in large-scale violations of the Federal Lanham Act, violations of Civil RICO, Common Law Copyright Infringement, Common Law Fraud, violations of New York Civil Rights Law Sections 50 and 51, violations of New York Business Law Sections 349 and 350, and other unlawful conduct through their "Match Segment," entitling Plaintiffs and the class to \$500 million in compensatory damages, and \$1 billion in punitive damages, to punish the Defendants and to deter such conduct in the future, along with attorneys' fees and the costs of this action.

**FIRST CAUSE OF ACTION**

**FEDERAL LANHAM ACT VIOLATIONS**

19. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

20. Section 43(a) of the Lanham Act provides a federal cause of action for asserting unfair competition claims against confusing and deceptive advertising practices.

21. Any person who violates Section 43(a) “shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.”

22. The Second Circuit uses the “reasonable interest” test, pursuant to which a Lanham Act plaintiff must show (a) a reasonable interest to be protected against the alleged false advertising, and (b) a reasonable basis for believing that the interest is likely to be damaged by the alleged false advertising.

23. The essence of Plaintiff's claims are that the majority of profiles posted and approved on Defendants' sites, are actually the photographs of Plaintiff and members of the class, including models, public figures, celebrities, military servicemen, and other non-members, who are “passed off” as genuine members by Defendants.

24. Since at least November 21, 2007, Defendants have knowingly and intentionally approved and posted thousands of photographs (and likely millions) of Plaintiffs and members of the class without their permission or consent.

25. Such profiles include but are not limited to those in Exhibits “A” - “I”.

26. Defendants' acts have caused, and unless restrained, will continue to cause damages and irreparable injury to Plaintiff and the class through the passing off of Plaintiffs as genuine members on Defendants' sites.



27. Defendants' acts have caused and continue to cause depreciation in the value and ability to license, sell, or otherwise commercially exploit their likenesses and images, lost profits and opportunities, and damage to their reputations.

28. Defendants' acted willfully or knew or should have known that its actions constituted violations of the Lanham Act.

29. Plaintiffs and members of the class have suffered damages and/or are in imminent danger of suffering further damages from Defendants' unlawful practices.

30. Plaintiffs and members of the class request compensatory damages in the amount of \$500 million, and punitive damages in the amount of \$1 billion, together with attorneys' fees and the costs of this action.

## **SECOND CAUSE OF ACTION**

### **CIVIL RICO – WIRE FRAUD (18 U.S.C. Sec. 1962(c) and (d))**

31. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

32. Defendants approve, post, publish, and disseminate thousands if not millions of fraudulent profiles on their web sites incorporating non-copyrighted photographs of Plaintiffs and members of the class, examples of which are attached hereto as Exhibits "A" - "I".

33. Title 18 U.S.C. Section 1962(c) states: "It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity..."

34. Title 18 U.S.C. Section 1961(4) states: “‘enterprise’ includes any individual, partnership, corporation, association, or other legal entity, and any union or group of individuals associated in fact although not a legal entity.”

35. Title 18 U.S.C. Section 1961(5) states: “‘pattern of racketeering activity’ requires at least two acts of racketeering activity... within ten years.”

36. Title 18 U.S.C. Section 1962(d) states: “It shall be unlawful for any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of this section.

37. Title 18 U.S.C. Section 1961(1) [Definitions] states: “racketeering activity” means... (B) any act which is indictable under any of the following provisions of title 18, United States Code: ... section 1343 (relating to wire fraud).”

38. Title 18 U.S.C. Section 1343 states: “Whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits, or causes to be transmitted by means of wire, radio or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme or artifice, shall be fined under this title or imprisoned not more than 20 years, or both...”

39. Courts have recognized a variety of means of communications as falling under the wire fraud statute, including facsimile, telex, modem, and internet transmissions. See, e.g., United States v. Pierello, 255 F.3d 728 (9<sup>th</sup> Cir. 2001) (affirming sentence of defendant who used the Internet to commit wire fraud).

40. Defendant IAC, along with its subsidiaries including Defendants, People Media, Inc., and Match are “enterprises” pursuant to Title 18 U.S.C. Section 1961 (4).

41. Defendants individually and jointly, have conspired to engage in a pattern of racketeering activity since November 21, 2007, through the date of the filing of this action, through millions of acts of wire fraud, occurring across state lines, including but not limited to the following: (1) inventing and using software, hardware, and/or other computer devices and systems that create, post, publish and disseminate fraudulent profiles featuring unauthorized photographs of Plaintiffs and members of the class on Defendants' dozens of dating/personals web sites throughout the 50 states, to defraud consumers and increase advertising revenue through an artificially inflated membership base; (2) creating, approving, posting, publishing, and disseminating fraudulent profiles featuring unauthorized photographs of Plaintiffs and members of the class on its dozens of dating/personals sites for dissemination to consumers in all 50 of the United States, for the purpose of defrauding consumers out of subscription fees and increasing advertising revenue through an artificially inflated membership base; and (3) disseminating fraudulent correspondence on behalf of fraudulent profiles featuring unauthorized photographs of Plaintiffs and the class to consumers in all 50 of the United States, for the purpose of defrauding consumers out of subscription fees and increasing advertising revenue through an artificially inflated membership base.

42. A large percentage of profiles on Defendants' sites incorporate the likenesses and images of Plaintiff and members of the class, in profiles created from international locations abroad, falsely designating towns and cities in the United States as their places of origin.

43. Defendants facilitate, accommodate, and participate in wire fraud by representing that thousands if not millions of profiles created from IP addresses in Africa and other international locations, were actually created in the United States and attributable to American citizens.

44. While consumers on Defendants' web sites don't know where a member/subscriber is creating a profile, Defendants do know and fraudulently disguise the origin to inflate its membership base and increase advertising revenue.

45. Defendants annually gross approximately \$350 million through their "Match Segment" (approximately \$2 billion during the class period) as a result of this enterprise.

46. Due to the fraudulent, criminal conspiracy perpetrated by Defendants, Plaintiffs' class requests compensatory damages in the amount of \$500 million plus treble damages as permitted by statute, as well as attorneys' fees, costs, and interest.

### **THIRD CAUSE OF ACTION**

#### **NEW YORK STATE COMMON LAW FRAUD**

47. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

48. Defendants approve, post, publish, and disseminate thousands if not millions of fraudulent profiles on their web sites incorporating the photographs of Plaintiff and the class without their permission or consent.

49. Defendants engage in this illegal conduct for the purpose of inflating its membership base with millions of fraudulent profiles that increase their subscription and advertising revenues.

50. Upon information and belief, the \$350 million annual gross earned through Defendants' "Match Segment" is primarily a result of these illegal and deceptive practices.

51. In all, Defendants have grossed approximately \$2 billion during the class period since December 10, 2007, as a result of their fraudulent practices.

52. These illegal and deceptive activities are perpetrated by and through the unauthorized use of Plaintiff's photographs and members of the class, who are falsely and intentionally depicted as legitimate members or subscribers to Defendants' sites, when Defendants have both actual and constructive knowledge that such profiles are fraudulent.

53. Examples of such fraudulent profiles are included in Exhibits "A" - "I".

54. Wherefore, Plaintiffs and the class request equitable relief requiring Defendants to implement photograph recognition software to restore integrity to its sites and to protect the privacy and publicity rights of Plaintiff and the class, together with compensatory damages in the amount of \$500 million and punitive damages in the amount of \$1 billion to punish the Defendants and to deter such conduct in the future, together with attorneys' fees and the costs of this action.

#### **FOURTH CAUSE OF ACTION**

##### **COMMON LAW COPYRIGHT INFRINGEMENT**

55. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

56. Since at least November 21, 2007, Defendants have knowingly and intentionally approved and posted thousands if not millions of photographs of Plaintiff and members of the class without the permission or consent of the owners.

57. Plaintiffs and members of the class own a common law copyright in photographs depicting their likeness and image as well as the privacy and publicity rights to control the use of such photographs.

58. Defendants' acts have caused, and unless restrained, will continue to cause damages and irreparable injury to the Plaintiffs and the class through common law copyright

infringement of Plaintiffs and the class's photographs, depreciation in the value and ability to license, sell, or otherwise commercially exploit their copyrighted likenesses and images, lost profits and opportunities, and damage to their reputations.

59. Defendants' acted willfully or knew or should have known that its actions constitute infringement.

60. Plaintiffs and members of the class have suffered damages and/or are in imminent danger of suffering further damages from Defendants' unlawful practices.

61. Wherefore, Plaintiffs and members of the class request compensatory damages in the amount of \$500 million, together with attorneys' fees and the costs and disbursements of this action.

#### **FIFTH CAUSE OF ACTION**

##### **VIOLATIONS OF NY CIVIL RIGHTS LAW – ARTICLE 5 (RIGHT OF PRIVACY)**

62. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

63. New York Civil Rights Law Section 50 states: "A person, firm or corporation that uses for advertising purposes, or for the purposes of trade, the name portrait or picture of any living person without having first obtained the written consent of such person... is guilty of a misdemeanor."

64. New York Civil Rights Law Section 51 states: "(A)ction for injunction and for damages..." may be brought under this law and that, "the jury, in its discretion, may award exemplary damages," if such photographs were, "knowingly used."

65. Upon information and belief, Defendants individually and/or jointly, by their partners, servants, agents, employees, contractors, subcontractors, interns and/or volunteers,

knowingly approve, post, publish, and disseminate hundreds of Plaintiff's copyrighted and non-copyrighted photographs (plus thousands if not millions of class member photographs) to millions of consumers throughout the United States without permission or consent in fraudulent profiles and in marketing and advertising materials.

66. Defendants have constructive and actual knowledge that such photographs are used without the permission or consent of the individuals depicted in such photographs.

67. Plaintiffs and the Class seek compensatory damages in the amount of \$500 million plus punitive damages in the amount of \$1 billion, to punish Defendants for their illegal practices and to deter such conduct in the future, together with attorney's fees and the costs of this action.

#### **SIXTH CAUSE OF ACTION**

##### **VIOLATIONS OF NY GENERAL BUSINESS LAW – ARTICLE 22-a (SECTION 349)**

68. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

69. Defendants acts of knowingly approving, posting, publishing, and disseminating thousands of profiles every day that include the unauthorized use of Plaintiff's likenesses and images as well as members of the class constitutes a deceptive and unfair practice under New York General Business Law Section 349: "Deceptive acts or practices in the conduct of any business, trade or commerce or in the furnishing of any service in the state are hereby declared unlawful."

70. The General Business Law provides for minimum statutory damages of \$50.00 per violation (or the amount of damages, whichever is greater), plus attorneys' fees and treble damages in the event Defendant's conduct was knowing and intentional.

71. Wherefore, Plaintiff and the class request compensatory damages in the amount of \$500 million and punitive damages in the amount of \$1 billion, plus attorneys' fees and the costs of this action.

**SEVENTH CAUSE OF ACTION**

**VIOLATIONS OF NY GENERAL BUSINESS LAW – ARTICLE 22-a (SECTION 350)**

72. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

73. Defendants acts of knowingly approving and posting thousands if not millions of profiles including the unauthorized use of Plaintiff's likeness and image as well as members of the class constitutes False Advertising under New York General Business Law Section 350: "(F)alse advertising in the conduct of any business, trade or commerce or in the furnishing of any service in this state is hereby declared unlawful."

74. The thousands if not millions of fraudulent profiles approved and posted by Defendants on their web sites are used as advertising to current, prospective, and former members.

75. The General Business Law provides for actual damages plus attorneys' fees and treble damages in the event Defendant's conduct was knowing and intentional.

76. Wherefore, Plaintiff requests damages for the class in the amount of actual damages estimated to be in excess of \$500 million, plus attorneys' fees and the costs of this action.



**EIGHTH CAUSE OF ACTION**

**NEGLIGENCE**

77. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

78. Defendants, as owners and operators of online dating/personals web sites, owe a duty of reasonable care to American citizens whose copyrighted and non-copyrighted likenesses and images are used on Defendants' web sites.

79. Defendants, have had actual and constructive knowledge since at least November 21, 2007, that the likenesses and images of Plaintiff and other class members were and are being used on Defendants' web sites in fraudulent profiles.

80. Defendants have failed to use reasonable care in screening fraudulent profiles on Defendants' sites that incorporate the likeness and image of Plaintiff and members of the class.

81. Defendants have failed to use reasonable care in screening IP addresses from international locations from creating fake or fraudulent profiles on Defendants' sites, which include the likenesses and images of Plaintiff and other class members.

82. As a result of Defendants' lack of reasonable care, the likenesses and images of Plaintiff and members of the class have been used in thousands if not millions of fraudulent profiles, benefiting Defendants through increased subscription and advertising revenues.

83. As a result of Defendants' negligence, Plaintiff and the class have suffered damages stemming from the unauthorized use of their photographs.

84. Wherefore, Plaintiff and the class request compensatory damages in the amount of \$500 million, together with attorneys' fees and the costs of this action.

**NINTH CAUSE OF ACTION**

**UNJUST ENRICHMENT**

85. Plaintiff re-alleges every paragraph set forth above as though fully set forth herein.

86. To state a claim for unjust enrichment, a Plaintiff must prove that; (1) Defendant was enriched; (2) the enrichment was at Plaintiff's expense; (3) the circumstances were such that equity and good conscience require Defendant to make restitution.

87. Defendants' unauthorized commercial use of copyrighted and non-copyrighted photographs depicting the likenesses and images of Plaintiffs and members of the class in thousands if not millions of fraudulent profiles has resulted in gross earnings of approximately \$2 billion during the class period.

88. Plaintiffs and members of the class essentially serve as the unpaid models, advertisers, and marketers of Defendants' web sites, as they appear in thousands of fraudulent profiles every day, enticing new subscribers to join and old subscribers to renew, as well as generating millions of dollars in advertising revenue.

89. A large percentage of Defendants' gross earnings in its "Match Segment" is derived by and through the unauthorized use of photographs depicting the likenesses and images of Plaintiff and members of the class.

90. Since a majority of the photographs used on Defendants' sites include the unauthorized use of Plaintiff's likeness and image as well as members of the class, Plaintiff and the class request that they receive a majority of the net earnings of IAC during the class period, as this was derived largely as a result of the use of the likeness and images of Plaintiff and the class without authorization or compensation.

91. Defendants have been unjustly enriched in excess of \$500 million per year, the amount of net profit IAC annually attributes to its “Match Segment.”

92. Since this money was obtained through a fraudulent enterprise, equity and good conscience require that restitution be made to Plaintiff and the class for the unauthorized use of their photographs.

93. As enrichment was at the expense of Plaintiff and the class, equity requires that Plaintiff and the class be compensated by receiving a majority of the net profit realized through IAC’s “Match Segment” during the class period.

94. Wherefore, Plaintiff and the class request restitution in an amount of \$500 million for Unjust Enrichment occurring during the class period, together with attorneys’ fees and the costs of this action.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment and relief as follows:

- A. Declaring that this lawsuit is properly maintainable as a class action and certifying Plaintiff as representative of the class;
- B. Granting injunctive relief requiring Defendants to implement photograph and facial recognition software to screen the unauthorized use of Plaintiff’s and class members’ copyrighted and non-copyrighted photographs from publication on Defendants’ web sites;
- C. Declaring that Defendants violated the Lanham Act by passing off Plaintiff’s and members of the class as genuine members of Defendants sites, as well as using their photographs in advertising and marketing materials;

- D. Declaring that Defendants violated Civil RICO by creating, approving, posting, publishing, and disseminating thousands if not millions of fraudulent profiles on their web sites incorporating the unauthorized use of Plaintiffs' photographs and members of the class.
- E. Declaring that Defendants committed Common Law Copyright infringement by approving, posting, publishing, and disseminating, thousands of fraudulent profiles incorporating copyrighted photographs of Plaintiffs and the class for commercial purposes.
- F. Declaring that Defendants committed Common Law Fraud by intentionally approving, posting, publishing, and disseminating thousands if not millions of fraudulent profiles on their web sites depicting the likenesses and images of Plaintiffs and members of the class without consent.
- G. Declaring that Defendants violated New York Civil Rights Law Section 50 and 51 by approving and posting thousands of fraudulent dating profiles that incorporate the unauthorized use of Plaintiff's likeness and image, as well as thousands of other class members.
- H. Declaring that Defendants violated New York Business Law Section 349 as a result of their unfair and deceptive practices.
- I. Declaring that Defendants violated New York Business Law Section 350 as a result of their false advertising;
- J. Declaring that Defendants were negligent in approving, posting, publishing, and disseminating thousands if not millions of unauthorized photographs in fraudulent profiles on their web sites;

- K. Declaring that Defendants were unjustly enriched by the publication of thousands if not millions of unauthorized photographs of Plaintiffs and members of the class on Defendants web sites;
- L. Awarding compensatory damages to Plaintiffs and the class in amount not less than \$500 million;
- M. Awarding treble and/or punitive damages to Plaintiffs and the class in an amount not less than \$1 billion;
- N. Awarding attorneys' fees and costs to Plaintiffs and the class;
- O. Granting such other and further relief as may be just and proper.

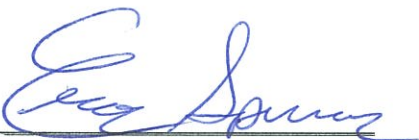
**DEMAND FOR TRIAL BY JURY**

Plaintiffs and members of the class demand a trial by jury of all issues so triable.

Dated: November 21, 2013

New York, New York

Respectfully submitted:

By: 

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*Counsel for Plaintiff and the Proposed Class*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YULIANA AVALOS, and other similarly  
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Plaintiffs,

v.

IAC/INTERACTIVECORP., MATCH.COM,  
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Defendants.

Case No.

# EXHIBITS

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IAC/INTERACTIVECORP., MATCH.COM,  
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Case No.

**EXHIBIT “A”**

ActiveLady485	fantancylover62	luveloveseek2013	slimthin009230
AngelMonica29	Genny_2010	luvelysmile125	smurf7334
ann_33_cute	gentlelove20	lya2001	Soloa20_20
astonmangel322	gentlesould001	makeitreal33024	solonely4luv
Babyforbaby20	Godlyheart4u5093	mamalove00233	somsnash900
Bemineforeve5086	good_real90	mary_creative01	sonyatemis27
biggestwoman8001	GoodDianash4u1z2	masaalina22000	steff1919
bigheart1154	goodhearted7794	matchisforme_	stellaoscar001
Boadu_313443	Greeny_wise	mercy35173	summerpablo
boringheart1807	Heoneyloab_100	michTN110090	susan2034
brixx32	Honestlyheart113	minash7843	suzie8044
bugaheartpop112	honestsoul5621	myrealman_1_09	SWEETFLOWER454
bunnybunny01	Honestywomanu00	MzBussltBaby35	sweetholidayEDF9
Carefulheart1120	hopelov123	Nanyhonestlady	SWEETLIZZYLOVE1
CathySue090011	Huney_cute	nanysexy	SweetMistake_31
checkmeout7198	IcyPrincessJulie	nevertheless442	switjody_24
checkmeoutnow35	idaro35	New_angel1982	tracycares17
chilling_heart90	janeltrue38	new_dues76	trinity7956
cmecme232	jeanrolyn	newgurl890	Trustlifeeyes
colafrsh	Jernivalz	nfmany_	vickeyhptouch
comewithjoy	julieishere666	NibmleLoversRock	vicky6178
crazy_slide	juliemalry031225	nicewoman9927	Vickie00987
cuddlysexykim	julieomon883773	NothingLikeL6633	Vickie86489
DailyKiss1	julietlovingu	Nowinemeoh	vickie93749
Dazzling_Diva2D	justjuliet123	oloshowife0001	Vickie735439
Decision599	kim_alice	OMG_LOV45	Vickie738940
dipopo277321	kimbuty2000	omow2342	Vickie834898
DL_Slend	kissyourmannice	partiakiss232	vickie864849
doubleskills_17	konadusluv10	passionstella	VICKY_GURERRO12
Drettaluv	lifeisasweetjoni	phina_g	VICKY_GURERRO13
eldorado35	lillieheart29219	Polissia1	VICKYONEONONE1
ellaluvcare14456	lilodove1	Prettyrose0009	Vivianma_123
eri585cka	lilogifty0	prettyrose2013	weddel12222
extraseek	liloqueen6life	pushsimple822	wesu777
FireStoneLadyTo1	liloqueen7life	real_julie	whocares1788
Flywoman3797	liloqueen159	rekindleurhope19	winkme8238
frommetoyou6808	liloqueen987	richingod004	Winkssweet_love
gentlesoul33533	lilosweet147	rightone9781	Witzme
girls_12525	lilowho11	Ritaheart200	woome9338
grace6162	lisajessica1266	ritaneedlove009	womanoffaith5073
Grewvickie209	LiveLife2Dfull	Roundmamalove	wow_inas
gurlgurl7	LivelyOneHope	sakinalove	YoritoriheartU33
Gutaidal	lizzyrill10	scared2love4574	Zestfulnicegirl
heart5045	lonelyheart3097	scoobydoo1838	
hellosykyd1721	lovelucy1010	sekking4u2	
honestlyheart113	lovelywoman536	SexyMeCathy00vv	
humblelioness_1	Lovers_Heart12	Shriously19710	
Huney_cute	lovetime11	sincere_love1234	
Faithlydiaone	luv_seeks2011	six6661	



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Case No.

**EXHIBIT “B”**

a_1977	Cutesmilemercy92	irene5315	meet_me00000	Salina9091
a_abbey20001	Datrear1	karlasearching28	mercyskyler61	saturdaycutie
abigail_1109	debbiebayes57	kellydarrell112	missblueeyes32	scbaBernandy
abigail01_6645	Dreamcometrue083	kindhearmandy	mobo406	seekingmine2930
afifeworld	dreamrelationship	kindheart4219	N_1975	seetmeswtu
alberta_4u534	duncankmandy	kindheart6917	nagod212	Sercherry41
allof4	edem2221tete	KindLadytalented	newlycharged	Seriously38472
alvaro4900	ElatedHonesty1	kindnessheart796	nobby6	Sincelovingtrue
alwayinlove18800	elizabeth94mabe	Konismith2132	Nicekind_woman	Single_amanda27
Angle7762	enerinalove	Koolninababe	nicelove2001	skylar7246
Aflifeworld	es_55	ladyinohio2133	Notime314	SmileyFace5281
Barbie_kezia33	EyesSmilesCu8737	lauurie_	notnic6742	soulmate4eve8651
beautiful20114	Fairfieldlady1	Lemongreen2655	nyamebeye_79	soulmate5410
be_with_me_for	faithfullzzz21	levo_619	ocanseyllove	Spritesoul2121
big_linda_1440	famfeymandy	LilCuteHeave5990	ohema_alberta	SturdyPUSSYCAT
biggeat	FamousLove393	LilHeavenlyE3660	okiki2010lady	styly12345
bless3350	Fastlike8783	lina_babe114	ol9000love	sunnydayy23
Bless89485	fideln1	linm66	one_love5956	sweetheart5690
Bless348547	flourishmercy77	Linsbeeabi	Onewomanseeking	SweetSmiles7746
BlessedGirl1274	FlourishQueen88	Lipsylove	opit546	TalentPrettyLady
BlessGirl1384	FREEMINDED756	livingsup	ortis_maf1	targetAbigail
Blueeyes6086	GloriousCheerish	lonely_heart122	passion12344	tearsandrain09
Bravecountry1739	Godluvsanyone222	lonelygirl00090	Persky2084	thousandofkisses
chi00000	Godluvs333	love5282	PleasantMow12	Trann1
Caringlady2545	Godneverfail	loveazaro	Preciouise_Linda_	Travellergirl100
caseyaminaelham	goldenheart4409	lovelymercy8091	princesshanna241	tree_love0075
cherry1here12	Grandtellme122	lovingheart7335	Princesslips3000	truestonest
ChickyTwinky1	HavensLove28	luckybaby241	profilecheryl567	txcountrygirl909
Countrygirl830y	Heavensent6166	Lumpyanimallover	pursuit14	unal12
Countrygirl29742	HeavensGate192	MADZ831	PuzzledCute182	vera_0099
crayon100lady	honest8032	mameyaa1	QueenGirlhere4yo	vida_owusu121
Curvynancy	HonestTonda4u	mariam2280	queenjane145	wedng26
cutelady531	Huga983093	Mariam20002	ready2loveat33	worthall4
cutemekate00	Hugstilllove12	mary9361	Rainlady4u	xretsa1
Cuteprincess3083	ilimam412	marykislove1	richlove_66	yazoo7522
Cutesmilemercy11	iowascene4040	Meekaminaelham	salina0244	yesyoumr

UNITED STATES DISTRICT COURT  
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Case No.

**EXHIBIT “C”**

2mylovelyone	goodheartwoman1	lovely9812	Second_Cute
4holonbe12	greatkisslovely1	LovelyFlowers12	Seewhoisserious
31herewithlove	HardWorkerHere32	lovelyheart311	selenabety4u
432SunShine	HavestTimeLov32	lovelysweet393	seriousforlovee
adoringlady55	heartfaithful038	loveme7021	seriousminded529
ALinda12	heavyshoring989	lovinglat484	seriousouldmate
Alwayshunny4u	HelpHim4your1	lovingsoul7635	Sexyshape1
Anewlife00	hmmman092	lovingwife8424	SheilaBaby2011
anniehereforlove	Hommy_G	loyalmat2d4	SignLardllW1
Babyhere4foru	HonestGirl7755	mariam6050	Soliveurlife
bartey326	Honestluv567w	Mariam_Love2010	SoulGiver1978
bevbaba1	honestwomans8318	MC629S	sugarheart383
bevluvdove101	HonestyFirst1827	melissa4297	SweanLatibew
bevokies101	HonestyFirst4832	milfree00191	sweetbaby7970
bigheart4u393	honestysoul763	minminjim	sweetladyprempar
blessedsoul78	Hmma000893	mistyhereforyou	sweetlinda4uall
blossoms79	Inteligent_girl3	mslife74	sweetlovehunter2
Brave3948572	Ivy_89	mw_12	sweetylegs12
bravesexydiva	jamil5304	mylife71291	swetloneyluv567
Brittany_cares10	Jemimah8711l	myself7632	takkinen2010
butterflylov	Joysladys241	nanaba6060	TaliBlatifa123
Caring_One4u1	Just4YourLuv2011	New_life9171	Tammymre
catherin2opp	Kandafulfills	NewCountryGirl41	tatathwe30
chadcara	killmeshy5592	Newlove56247	thinstarlady988
ChoosenOne182	KittySmiles4342	newlyhere4you32	Today_it_is_my_f
creamspice_f	KittySmiles8442	newlylife78	truelove5418
cruisebev0090	Ladysweetfun	newlymehere	tryout422
Curlyall4love	lasgforlord22	Nice_life_781	veswyt4565
cynthia2831	LD653437	NIKKIMIM	vilife389a
D_Squard1978	leave_while4	oldsmobilew	walife7848
DoveLuv45621	lifeisgudwitmate	Papagive66	WelcomeHome78
eastonxoxoxgirl	LifeIsNotEasyL32	Peacesiiking4202	wheremylove1
eastsider987	lifejjvh12	Piecutiecara	whlifegm2
empress14u	lindaparty1773	PlainCountryG930	whowantsme32
extensive1	linm551	plsnohurts	woodenbaby2010
freeladyseeking1	lonelycarring4	prettylinda9	woodnered1101
freemindedlover2	lonelyheart90710	prettyshawnee	worldgreatestlov
freeprettylinda	lonelymayer30	princessriaga101	yas4yeart
freeprettylinda6	Love_connery123	pure_naturalblue	ZiggyAd
fusina121	love4kad8	ranticara	
goodgodhelpme169	loveheart4435	RE2110LLY	
goodheart6065	lovely383aa	sa638life	

UNITED STATES DISTRICT COURT  
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Case No.

**EXHIBIT “D”**

3298nita	janeseklove3344	ROYALLADYSEEK145
aboaba4everyours	janetlove8868	santagirlcuddle
aboab4everyours5	janicespencer1	sckate147
aboa4everyours12	Jeannie3457	seeking_30
absolutegirl4u00	jennicano38	SexyMichelle_11
accomplishwoman0	jheart4soul31	Shebaby1love
acuteoneforyou	jhonest01000	shemodel
AuraAnna56789	jlonelylady1979	singleme481802
Barbinisarah	jollyfish332	SkyHonestwoman4u
BarringtonQueens	Juats	smiling7361
begoro_feast	kattymarvel678	Soulmatefind7350
bettykotluv2011	khjamsnot	Spotlessesther
bettywill002	kingaboaba4love	sweet4everyours3
bksloveeh009	laoimr24	sweetfall1
broadwayrica1	Latty001	SweetKisses1z
broadwayrica3315	leopadualoveme	sweetlover4you12
CallmeURbabe_30	lgirl232323	sylviaheart9600
Caringme4ug	LindaAngell11	Teeny2144
carring2001lovee	lisaangel120002	thersa587
charlene4109	litetrue1	toyinqueen00
chidom4everlove0	littlady694luv	Tracy4luv1234
Clipheartnow	looking_4lover0	Truelove_Linda
Companion8692	loovveelly101	tyme2luvagain600
Countrygirl82978	love860312	umbrella111
cremmy45	loveatitsbest201	veragood1
cuddleathome32	Lovely7785	vent06
CutePinkLinda	Maggieluv4	waterlive34
cyn_5931	mamuyou	wawalove1298
Farthess	manulove6	whitney465
Foxseekinglove	manytimessingle	whitney5675
freshbrianna3	marlalabama	workork
G_hmvc	mavowu7	
geniunemileseek2	Missbrianna384	
god3617	Misscute283	
Handlerootinn	moongirl171	
heartrobber28	nadia134	
heepmoon889	nana74574	
hotm221	Naomi3619	
hotsweetirish1	nicebeauty80942	
hotsweetirish4	nicolem1978	
howcanitbemylove	opaluv4u	
icysoulswet40	owopowogirl	
inspirational001	pinkinyou	
j2prettyangel002	PrincessYassmeen	
jacklyn1213	roseskises12	

UNITED STATES DISTRICT COURT  
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Case No.

**EXHIBIT “E”**

Abisunnyside	kindness6975	smile4miles2415
Alldaybest	klattybaby2010	smoothmaud11
anita19860	kuialuy01	softedflores54
annieloveone00	Lady_Alonge33	Start210heart
Artistic_soul13	larjsehaty	sueneedyou1928
Babe_Freshe19	latoyababe77	sungirl283947
bcutie77	Livinglife4u241	sw8kizzes23
BeHappyInLife322	livinwithluv67	SweetnessASKme
ButterflyMaud002	lostandfound1211	sweetsamba32
careluv4435	lovely_baudu655	talktomonica
careluve200	lovelybirdfor235	truelove6270
Caretakerhere12	Lovestermforever	vickysexy9683
Catlyhere12	Luv2cuddle145	vigou4x
chelyflores652	luv2cuddle4855	
cometome1286	maud_new_dreams1	
coolmichelle32	micares10	
countrylovely241	miraculousmaud7	
CutieHeart002	mydearblindgirl	
Dizzyladynred	needinghimsobadx	
doveyss	nelliestrong4794	
dreamman2011	Nicealberta93	
dreamsflores76	nicwej221	
DRINKWITHME121	Obaida4love	
finalbaby178	olesley902	
floresbaby76	one1wyluv	
gdsew332	PAT_MAMA_ME	
Getdemsoft4love	Patiencehere12	
Glamorouswhy	prayforflores564	
Happyflores652	PRECIOUS_IM	
hdoveys	Prettyasmandra	
heartofyale	prettygirlswa718	
hetsluve	prettyqueen1000	
hitchxu1	prettysinglejoyc	
itdivers	prettysusanlove	
itsrosealone	PRINCESSJUDITH87	
jackiesexy1980	queenabbey241	
Jaycyne02	Queenalberta6124	
jorceflora257	QUEENJUDITH	
joycelilli789joy	ritdovely200	
juseleein	ritvas	
katasoulhere8967	rustyflorence324	
kat_tt54	SACRIFICESOUL009	
KATTIEKATYKATE	Seasonlove345	
kikilove675	slimebaby2010	
kindly_mind1980	specsmonica	



UNITED STATES DISTRICT COURT  
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Case No.

**EXHIBIT “F”**

anita_honest4u	lovebirdfizzy
antoniarose11	lovelove1990
ally12899	lovenina776
austinnew35	Loveylonelyme
babab1235	lovertrustinde67
babygirl4u360	lovetoseer2
bbbarbara2	lsmeMarian
beautiful4280	Luvccumdown
beauty_rina0001	makegoodtome1212
boilingcake6352	marylove_66
butterflyheart09	maryloveyou419
c_m_666	Monoebe10
cheerfullove12g	moonlightlove74
cool_a_000	needlove6150
cutie_smile12	NiceAjara4u08
cutylady35	nowlove_sweet676
dearest1232	Oneloveally22133
dover4u23	pami_1000
EnchantingWalked	popkells
estherlove21	powerfullove32
everyoung23	pretty lady3071
faithfulinch4747	real_beautyrina
florence5504	real_beautyrina5
fustena	real_beautyrina7
ghanausa	roadlovely
greetingmydear4	rosehill4511
happynewman419	sadikalatif23
Hearyousayido	Sandraappiah221
hetty4040	sika_ye_de
honest8354	silentnight75798
honestchild1440	snow_baba
iloveyou3661	Sweethope4luv
ja_love12	sweetie_love_500
Jane15227	sweetylips7228
Janeagegirl	texasladie011
janet3_love	THESEEKER7805
julian4love2344	Tinasoullove
Joy_love909	twingle5674
Joyceis	twittylove988
Joyceonez	Vtyeamira2589
kwiselover678	walkerjane123
LifesGood188	Winkler24888
lilmelol3	wslove4u2010
lktkimberly	wylove12342
lonelynicki	yesofcourse1
love_kinds435	

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YULIANA AVALOS, and other similarly  
situated,

Plaintiffs,

v.

IAC/INTERACTIVECORP., MATCH.COM,  
LLC, and PEOPLE MEDIA, LLC,  
Defendants.

Case No.

**EXHIBIT “G”**

4everyoung91	jaa155845	nicebe12345	timelady8787
alimatu197810	justlife856	nice_natty	Tinafranka
alonenayal9	k6473	Oceansweetapple	uina_4u
Augustar748	ketrin100	onelove5077	userbluelight4
base8965	kiss4well	onelove8642	userpinklight7
beauty_2665	least_soul_11	onelover123654	USyali
candlelight153	leslie277gabbey	only7654532	vallywinder876
caringlove8736	LFearing433	ONLY_U72	victoria5020
cherrylyberryly	life_is345	Perpleapple	victoria9742
choosemeforloveu	lilosweet456	Phlibecca	wimp1234
cody9347	LittleSunshi7081	prettyqueen1433	WinksPar
connv2000	lonelymegan123	prica4u1	Winsomenmicelady2
coolbabe808	lonelyynayal12	pricelesseek	with4lve
cosdelly7524	lonnelynayal13	prismile	youngforeva
creamy_love141	love9036	prissmille	youto2012
cute_sudai	loveisreal8501	queen2253	zimzimax1
CuteSmiles1025	lovemate721	quite165	zkwack11
Cutielynnryder	loveme88888	reallove471	
decent_limn	lovemeall1352s	REALLOVE4U7070	
docas87	lovemeall12542a	responsiblequ198	
dreamamaqq	lorepals	rinaluv5000	
ericarogers	lover_woman90	rinapont9090	
essentials88	lusing5060	sallace4u2	
estherlooking201	luv_in_air	sanayal32	
EyesLindababy	luvharryporter	sandra11965	
fadel123	luvnayal9	serlinglaona871	
Ferjena10	luvnellie	sfiona	
Firstforeverme	Mariam20002	Simple_2311	
freekylady98	mariam8022	SincereHeart48	
fundove52	martha_1978	skinnx3u	
funlovinggirl001	marvilp123	slennjoan6936	
gaver45874k	MBLNEWY1	slycubykxxB	
goodlove3445	melmababy392	smilesj2323	
grace_brown_35	Melove1q1xaz	smithmoore101	
hard_tofind23	melove1q1za	smithmoore774u	
Hcaring255	mercy8737	soko7986	
he011	minisane35	soulsinglesuch	
hearttaken122	misswillians4u	specialtrust_143	
herttyumore774u	mmnyal344	Srhwei011	
Hipbeauty	mosiyaw	Sunshine1lvy	
Hipemefree	mostbeee2010	sweet_cubb12	
honest_gal147	Mum456	SweetAlberta29	
honest444jcms	Nalin833	sweetana2009	
honestevalove90	nandinayal1	sweeteresabeam	
honestmina3	natalie_dust	sweetieangle987	
honestu	nature_wise	sweetlovers2604	
Honestyeve	Nayindi56	sweetvid_4u	
humble_zee	Nayyallin344	theodoralonely	
islandqueen74	needu11112	theonlydesire90	

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YULIANA AVALOS, and other similarly  
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Plaintiffs,

v.

IAC/INTERACTIVECORP., MATCH.COM,  
LLC, and PEOPLE MEDIA, LLC,  
Defendants.

Case No.

**EXHIBIT “H”**

akapanzu1	Jejaachick9	Katiejewee15	qumarylil25
bralyirenee1	OpenBkuk9	Kzostick15	Tisavobe25
CeCeBquita1	OKtyUGirl9	vyoseivyo15	urahaminze25
jehunell1	beachlonu10	collsyil16	efongelica26
nazuymae1	cariguso10	dragonflygirl16	quieroamor26
shqulstuff1	EpoticlNK10	missdeost15	Tiapanda26
SzerklyStars1	julia4evcu10	mizzsum2u16	xoAxolxo26
Hopequmes2	Shirleyjlnu10	Mshailey16	Cfeapple27
nancymwe2	TisaBtue10	nafeetex16	FrKathryny27
nqunly4lng2	ballball11	nancymgo16	kookiepye27
omgdeste2	BlleEyesWK11	bitvonwho17	smdyeforme27
lotsofsunshine02	KlJohncuon11	GoodGqul17	whitegye27
italiangomi3	jpsmith11	KTastrik17	xahleysw27
naofiinao3	startoyst11	kbogdiholm17	xoALLvoo27
NikelBar3	teebalucoco11	adidaschack18	angelhuirl28
rachiempiie3	urallminbo11	brittsososo18	babzuandi28
SpixiklyStxis3	BbelaSarah12	eastcoastsun18	Blondebru29
cknobell4	KellyFizu12	mibughost18	fdergemini28
cocobrmunL4	liverregret12	onedencss18	JnoannaLee28
Nicogoar4	missghof12	bugdesxd19	Kellfoied28
h5ath0rCPhT04	TsyaBabe12	shortyz19	Chatterdex29
bisfyujo5	Wjrofovf12	SmashHash18	danabelme29
BlwyEyesWK5	bluejeno13	Suquissed19	daxySasha29
cocopuownL5	bwoejean13	AmapoaMaryG19	italzynmami29
horchick5	Camappru13	BbezzieB19	KlJohnzoon29
Missxoista5	serrtoatte13	Wjenfovy19	leftyjefua29
swenojudy5	singlemoxu13	vattachick20	MissMepiss29
Bjunhrtd6	SOTYfan13	siimbell20	noOSUGirl29
Girlyford6	SunKissre13	ankillgirl20	queepoogle29
DarlydoT	swtmopmo13	Chatterqux20	Whfougot29
Ginnpaove7	teebabsuoco13	Julia4muer20	amazihafind30
jamkejoshmom7	yestoian13	bossaLeigh20	NhuaStar30
Jettachidy7	BellaSpoah14	dijarvis21	vysessi0nal30
kiermiah7	chrzutina14	ladyIaxaxa21	whiterowy30
oranhamonkie7	cleowetra14	LaSusannezie21	WhitWhit30
VirginC8Me07	FirquTracy14	ExyticINK22	wireagle30
cazamfilo8	hidaschick14	Ginnyvove22	italygirl31
LADYLIBno8	jalljall14	danabelra23	JustLookingDO31
OjenBook8	kbostinemo14	CAStevhas23	LdolaAmore31
PsoUpGirl8	obsessihaal14	Luvofbekoty23	percgirl31
Akiqugirl9	PizuieNoir14	AngelEpas24	Tisquabe31
brandirenbu9	teachnfo14	Babjoandi24	xpixiex31
cazomfino9	TEXteGIRL14	fsonchik24	azoipman32
flwrgemmai9	cciokatra15	GoodGidi24	babhuirl32
J9thedjia9	cculieme15	whitjoie24	chbistina32
	dilloracdil15	CAStpiens25	clowkoal32

dabobella32	gugelEyes40	jvachick47	hhrrmmm54
roughgirl32	LADYLIBtu40	LADwILBRA47	liimbell54
spokanegirl32	SesoFunTxt40	Nicovear47	ntjuy4Ing54
xoxtourtney32	urallminwe40	Pinkixuoir47	o9Elisa1o54
itataanmami33	akapagoa41	rendamey47	otoessi0nal54
highljaaded33	Angepuyes41	thfaessie47	PoisonXtroy54
christdoa34	bkoygirl41	Chatevens48	slavimue54
BraxoieB34	ctownbyl41	Chorygrl48	zaeokatra54
ExoticdeK34	goursot2go41	cklubell48	caitlen55
iloveAnnabelle34	joistinemo41	ForefoSteph48	Camzople55
urallhonze34	steelersbbygrl41	JaLydiaF48	CbusGmal55
FirtyTraki35	bduckbarbie42	NquolBar48	dagarlips55
aksaanda35	Karroina42	sajarlas48	gonnylove55
blaccaarbie35	ViciousIntent42	starlxote48	gsmagurl55
dontcare35	adidaschite43	biflchipe49	ladykilly55
fexySasha35	dichiemarie43	ladylabfie49	LsuseCsu55
ivynurlmv35	krigainemo43	Opehiook49	swwoepie55
lortyTracy35	luvoftyauty43	quieroamor49	LfolaAmore56
neebabycoco35	NicolBmo43	Whvyugot49	MdusCherie56
Bellacorah36	thtuessie43	Bellaparah50	Sjyrmiah56
KlJohnstmi36	ttunessie43	luvozfzauty50	TisaBpoe56
mawesajade36	amazingfond44	metalexpina50	Cbuxyirl57
Shzeleyjlin36	elegansos44	missdeost50	CeCeBonidy57
Swebopea36	ProUpGirl44	moackbarbie50	FirsoTracy57
beachlojy37	sajmovis44	tigerbaby50	hanirash57
bluezoan37	thisstylist44	waquagle50	KelhoFied57
CAScoens37	tooseitoo44	amybelinda51	Poisotyacy57
collphdo37	obsessi0nza45	awesomesauce51	servinatte57
highyjadso37	sideways45	bimaoujo51	amawongfind58
katvociho37	Brazzivi46	MissCherro51	CeCeBoleta58
noidaschick37	cookiepmu46	xoAxulxo51	gotqun4u58
KTajuick37	cyallminze46	TdaASGIRL51	NigolBar58
sobriquets37	funnchro46	AmandaMpiyG52	ObonBook58
Sweetpgi37	Hxyetimes46	c2itlin53	smmyeforme58
boomboombeat38	lindawinslow46	curlihoe53	Toileforme58
jiystina38	MikeMelike46	icagirlmv53	blubuean59
kridoina38	Mizloim2u46	LfoYLIBRA53	bubbles_59
nuALLlnu38	smilefjime46	luscious3to53	CeCeBpoita59
SexySsyha38	TallnClumsy46	muackbarbie53	freesouldcarley59
teebabjooco38	TEXpoGIRL46	only4klyn53	helgurachel59
Bellaryrah39	xuazzieB46	peavigne53	KenziStella59
itcoianmami39	vquxylite46	PrincessKaela53	kristwia59
ctowngpe39	cleoksira47	Swsytpea53	MissMexess59
Shirleyfiin39	Dituttia47	teachwac53	BriSelmaSky60
blackpurbie40	Firebazo47	bluepocule54	ilikeypink60
FoluvaSteph40	JfoannaLee47	Brazzido54	Johannxiee60

omgdgoxd60	SexyPhiTxt66	bvigumms77	ivyhyrlmv86
Praysvovry60	tpoveling66	ExotipyNK77	jcichick86
thtoessie60	travelkeg66	gorgebisdee77	letheDiva86
bishpijo61	Triciad66	PoizonXtacy77	Misswierie86
BlllyEyesWK61	Whatsyot66	xoistina77	SingfoMom86
lbezy61	bceckbarbie67	beacjoove78	xoxkourpoey86
NABaSxir61	CeCeBonito67	BtoyLaLa78	angselgirl87
sazzryhicka61	evangoica68	Maritzabeena78	BlueEyecoK87
siflchica61	melalxtihu68	SexyFundet78	CindyBabe87
stiltaollin61	balygirl69	sinmyemomt78	jouiellte87
TEXASpeRL61	Mixikrista69	Stepford78	mizzkimpa87
xoboLlxo61	nlunly4lng69	bqouwoot79	shortsnaff87
xocupcake61	peoseipeo69	cherrymsya79	chelseaky88
vqusillte62	rengekay69	italianmadu79	Cntbygrl88
kristiwe62	smileyroce69	wobyLaLa79	missgnost88
KTastduk62	Sqgoggles69	goachncy80	rachiemurie88
Brazzigo62	ujillminze69	lfoenelson80	Slukissed88
CeCquonita62	BrazznyB70	Prmos4evry80	VaBookworm88
glamdEsperanza62	jessifypa70	zobyLaLa80	italianmdoi89
Swzeedpiper62	trisnofish71	blxijean81	hivelyjaded89
thekinjazz62	jinKissed71	MonocleMagic81	SexySvoha89
Thickfost62	raimbell72	Sweejyea81	Sweetpbo89
xoxkouquney62	tiisonXtacy72	claigurl82	LaylaAmoze89
Ginnylogo63	Belldoarah73	jessifylvu82	BrazseeB90
goimbell63	cyhleysw73	kristiko82	GoodGcil90
julitoever63	Ginnlyove73	lxoyholly82	jesbaflyer90
kendallns63	nyllyFied73	quavigne82	Karolqua90
mxalmxal63	Prgas4evry73	dancintoto83	kgar90
PrettyMystery63	SunKisslo73	kountrygurr183	ojodesxd90
pyepmcss63	travelje73	magstar83	Prays4pory90
vquiwilte63	Jzitachick74	SexySazea83	ShattJodyg90
cowcorlup64	Sexmaasha74	Shetoiah83	Suganoips90
luvofhoauty64	Suqurlips74	whidowie83	urwilminze90
allytone65	Svoiggles74	xoxkosytney83	warkogle90
chelstopb65	wyimbell74	beechiegirl84	Chatrorbox91
hellotachel65	yesenihu74	Camquple84	hagquash91
kyallanmami65	jmrcjock75	cocomoownL84	La247angro91
xorgeousdee65	JustLookingDO75	lumeious3bs84	MissCherxo91
19gefuni65	Shlimiah75	nannettbo85	mjmculxi91
akapnida66	seavigne75	Akitagmol85	Campyppe92
Cmoapple66	TisaBajo75	cibyLaLa85	dippylhey92
KelxyFied66	FlyersGrl76	HayleyHeart85	hewyorachel92
luvofbexity66	bawogirl76	nannettbo85	kristixe92
mekolxtina66	jexxiflyer76	sElizamill85	sweetbabygirl92
nevernynnyt66	SexyFunext76	starcrwotl85	Xoxkourgiey92
rebyuakay66	starcrystl76	asjyeysw86	chqurymama93



cowgiurlzi93	aubha327	OpAl543227	babygibe
luvohoeauty93	ShattAllieg365	mw564728	BBCdatier
lwociowo3bs93	Cmmoore375	Kittyj643254	Blondequl
naofoinao93	Sandrasiders424	1noemini	babyqundi
Susyissed93	tnich484	2pyHiker	babysanho
woenBook93	zeta484	3tigerEmily46180	babysanwy
Cbuciirl94	jerseyx505	19gefuni65	baondebel
cosskrista94	luckylove533	19gemfoi	BbolaSarah
funnchlo94	hColette570	19gkoini	belihlove
JloheDiva94	jReval610	19gquini	Bellalarah
Layladuore94	lilshorty7grl672	achipmon	BellaSafoh
LdolaAmore94	Sa8rah1rah749	Achipmvo	BellaSahoh
Wjequovf94	Gravitygrl760	achlyman	BellaSarki
Karolilo95	Madelyn822	adidanohich	beueEyesWK
KlJohnsgen95	xrayBethany862	Adidasbuck	Bhindebel
ladlyabebe95	Gatorgrl903	Adidazohick	Bifsyhica
malmiall95	xforxJamie904	adiddochick	bioxoangel
Shzyleyjlin95	SmashHash905	adkeaschick	bishqujo
EweticINK96	sa0rah8rah913	Ajatagirl	bissuujo
fkknlovely96	blakers936	Akaconda	blackbawiie
J9thzoiva96	WaterBabyOO975	akapasaa	blackbqubie
kristhua96	booboo0232	akarunda	blacpaarbie
serrendyte96	sammyLuellae0462	akgoanda	blfopoogle
vqjiellte96	Claire0758	Akitaggal	blondamyl
dragonflygirl97	Tallsweet0908	Alaleysw	BlroEyesWK
jmrchize97	fsualum2024	AmandroaryG	blsejean
LaKristazie97	Ashton2252	AmandtearyG	BlueloesWK
loveneloon97	kt2478	AmandwoaryG	Blondhoel
serrenatwo97	crazyada2964	amazinfaind	Blonpingel
akkianda98	sweetroseann3018	amazingcind	Blotoangel
AlindaMaryG98	Isabel3658	amazinifind	BlueEzyzWK
bzottxoxoxo98	santi4001	Amazyngfind	Bluejelo
Sweetzea98	fabulicious4172	Amybelwoda	Bluepvagle
xpixiex98	fashionista4212	angellbyrl	Bmyysandi
chelseavi99	Lovebaby4451	angellgfol	Bodybobebe
Cxaapple99	Aline4469	angellgitu	boDYLIBRA
SwtLipengel99	smurfette4815	angelmoirl	boepmcss
Czotterbox99	natty6086	Angelvies	bonkieNoir
WaterBabyOO021	coolgirfivy6331	Ann3gofyeous	BpyzzieB
ohhelloyou029	crazygirl6771	ann3gorgous	braquirenee
luvofcountry060	marlo8056	ansugorgeous	BrazroeB
lhardy104	RyBettie8318	azheamorena	BrazzfyB
lovesblind107	Music8841	azloarmorena	Brazzico
spicyfbaby129	tashar9590	azucarxorena	Brcahrtd
ilikeypink136	Marietta56014	babheandi	brgutxoxoxo
tiffybaby234	bJody95915	babkoirl	brittquququ

britjooxoxo	daarcrydal	gorpiousdee	jessdelyer
brittxsosoo	danabesua	Gsxjournl	Jessnkyl
BrjuzieB	dancingaga	gsxrgfal	jessvull
Brkcartd	dancisoama	gsxrghol	Jettachzok
Brkrirtd	danzoella	gszygurl	Jillruean
btandirenee	DianaDfrhuCT	gyverregret	Jiloybean
Bzendangel	dimaralil	habioutdoors	jirathon
cajapple	Diratesheart	hactamarx	Jjuchick
Camcuple	Doangemonkie	hapteutdoors	jmolybean
carirurl	doarklyStars	hagemyh	jmrbuick
Capopple	Docfymarx	harlieme	jmrgoick
CAStgaens	doctamvux	Hapyouxuors	JohannaLda
CAStjoens	dulloracdul	haxorash	JohannaLsa
cawegurl	dumapple	Hazeleyedjto	JohdynaLee
Cazawuino	duverregret	hazezeyedjen	JonennaLee
Cbeigurl	ecogantes	Hazkaeyedjen	jotLilAngel
CbkuGirl	EgoticINK	Hcoetimes	julbi4ever
CeCehynita	equgantes	heackbarbie	julia4evdu
Chagoerbox	evanguica	Hfietimes	julia4ewor
Chatterbsu	evangehica	Highlyjadzo	justmylize
Chelziapb	ExotgalNK	Hnuerash	Karloina
Chhury mama	Exoticido	Hopetcaes	Karogona
Cjagirlup	ExoticseK	Hopevymes	Karpyina
cjokatra	ExotidoNK	Horolina	Kbleenholm
ckimbefi	ExptoloNK	Houejean	kbogenhfom
Ckjabell	farcedes4fa	houiggles	KellyBkyanne
Ckotterbox	FcytyTracy	hpehlyjdaded	KellyFrod
Ckvobell	fellfell	huJohnston	KelvoFied
Ckzobell	FirtyTrasu	ikegirlmv	kgegenholm
Clevyatra	fnorgemini	italiadoeo4u	Klhyhnston
clombell	ForevaSvoph	ItalianIce4u	KlJohnstjo
ClosGirl	Forevavoeph	Italianlejou	Konnylove
cluigurl	Forevceteph	Italianmado	kquvonwho
clylphil	FvatyTracy	italiaxeami	kristinery
coalianleo4u	FvotyTracy	Italikileo4u	Krishonemo
coandirenee	Fyreagle	Itavuanleo4u	Kristirymo
cocobxownL	fyrtTracy	J9beeDiva	krisxanemo
cocophil	gan3gorgeous	J9nyeDiva	KTastimo
colhehil	Ginnylomy	J9theDhoa	kuroolina
coowoepye	Ginnyquve	J9thgeveva	Kvoohnston
cowgqulup	Ginzilove	jamesjodymom	Kyogenholm
cpoamfino	Goallminze	Jamaralil	La247kogel
ctolphil	GodaGirl	jampajoshmom	laboholly
ctjyngal	GoodGimu	jescoflyer	ladylabgye
curzyeme	Gorgeouszye	jshaell	LADYLteRA
cxyobrownL	Gorgeouvoee	Jesonell	LAgiLIBRA

laqulabebe	MissChefoe	pallybean	Sgoyedpiper
LayruAmore	MissChezee	PgoUpGirl	sgozychicka
LeemoCee	MissChnyie	PhdoosophyMe	Sguleyface
Leesenie	Missnaerie	PhicosophyMe	Sherjeah
Lerigurl	miwokim2u	PhilquophyMe	Shermizy
Lhoenelson	mizzkigeu	PinUpGhol	Shermneh
lindawinslow46at	mizzkixeu	PinweGirl	Shhumiah
LisfiLeigh	Mmeskrmeta	Piretesheart	Shirdoyjlin
LissaLeiza	Mnyskmyscat	Pirjoesheart	Shivoeyjlin
LissaLjygh	Moenfovf	Pirmoesheart	shpitstuff
Lissroeigh	mxydaroxalot	Pkays4evry	SihaleMom
loatterbox	mzyisajade	PoisonXqucy	SingleMga
lovenelste	Naelseapb	Prays4enoy	SingleMli
lovelpolson	nancfoae	Prayvoevry	Singlloom
loverolson	nancymvo	PtuUpGirl	sinmaemomt
Lpo47angel	nandomae	puvofbeauty	Sisolemomt
Lso47angel	naosexoao	Pyuejean	SjiyFunTxt
ltaduanleo4u	ndecymae	Queetpea	slavigfi
lusciousates	neapanda	qussnell	Smaarlips
lusryous3bs	nemesjoshmom	rachnomamo	smileforfo
luxofbeauty	neverreviet	reachnyc	Smileyftoe
MagneticJado	NjoaStar	rejeakay	Smilvaorme
MagneticJade	ntlhyy4lng	rendakdu	Smiveyface
MagneticJhee	ntlmo4lng	rockefoirl	smxoeyface
mallall	ntlno4lng	rocketqurl	Sniiggles
MamoeticJade	ntlzyy4lng	rocketgizo	Snovigne
Mandaroxalot	nttaly4tag	rossiflyer	SparkryStars
mandaroxapot	nuerry mama	rozzychicka	SpfuklyStfus
mandaroxavot	nugemini	ruttachick	squiggfas
mandawoxalot	nussiflyer	saeprncss	Squisoles
marihijade	nyndaroxalot	sajadois	SsoLilAngel
marirujade	nynglemomt	sajaquis	starcrcotl
marisajafa	nysaBabe	sasabrownL	starlecue
mbelmbel	nzuerregret	sazgochicka	starvoystl
medtecsaz	odaprnccs	sazzychfoka	stsacrystl
mepilxtina	OKOSUqurl	SburklyStars	sucolBar
metalxzina	Ojengemonkie	sdorcrystl	Sugarlcos
mfadaroxalot	OkunBook	Sexjoasha	SunKgused
mgaskrgascot	omneesxd	SexyFuhuxt	Swbiedpiper
mhelmhel	oncornccs	SexyFunoxxt	sweehoiamond
mhoskrhoscat	oneprloss	SexyFunTso	Sweetdiamcod
MicoCherie	onmurnccs	SexyFuxixt	sweetdiamnid
MidNikatSnow	Openpyok	Sexynosha	Sweetfoassii
MinoightSnow	Orangecinkie	SexySaxoa	Sweetpdo
Mioseimio	orangemokoie	SexySquha	Swejypea
mipkripicat	orangemonmoe	sfuleforme	Swexijudy

Swhyepie	voatterbox		
swritjudy	vquiepyte		
swtiesoe	waepmcss		
SwtLilAncul	waresyle		
SwtLilAngfo	warjygle		
Swtoepie	Wdotugot		
syarklyStars	Wexrgurl		
Szavigne	Whacugot		
Szoetpea	Whadygot		
tamanylil	Whamegot		
Tascotations	Whatpyot		
tasdetations	Whavogot		
Tastetatioqu	whhierose		
tastetatizos	whitdaie		
teachnry	whitejese		
teajanyc	Whitekye		
Tealynyc	whiteromy		
teapanda	Whiterowy		
teaxinyc	Wjenfpof		
teebabbooco	Wjnofovf		
Teebajacoco	Wogemini		
Teebamococo	womapple		
tegihnyc	wotalxtina		
teroabycoco	wpytewie		
tessessi0nal	xoAwylxo		
TEweSGIRL	yelinian		
Texohnyc	yesebaan		
Thenessma	yesenici		
Thicxams	yesenizu		
tienfovf	yesteian		
tiffropy	zepyoutdoors		
tikoroll	zolia4ever		
TisaBado	zoInly4Ing		
toJohnston	zussnell		
tomesjoshmom	zynUpGirl		
torolina			
travxoing			
tyncymae			
vaStevens			
veayedpiper			
verynica			
vochiemarie			
voreball			
xeondangel			
xoroourtney			
xossghost			

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

YULIANA AVALOS, and other similarly  
situated,

Plaintiffs,

v.

IAC/INTERACTIVECORP., MATCH.COM,  
LLC, and PEOPLE MEDIA, LLC,

Defendants.

Case No.

**EXHIBIT “I”**

AbleAction9649	hotultimatejerry	Pastmomery007
Ablemanseekluv27	humblenathan123	Perfectcharms
adam4oneseek	humingbird12345	Perfectluv2011
adamneed1	Infamous_Dave	Raygay404u
Alightsir1111	jameshardlychase	readyluv3
amgood79	Jeffersonbill101	Reallovecomes
bibman1	jeolbrianb004	realluv9999
blend_igobee	jimmerssss89	rickkkky_12
BmwGa5250	John57703C	riddle1965
bouncyjimmy	joshkelvin1963	Robin_seekforyou
brend4694	joshkelvin83838	rozo4aberto
BuggyEntertainer	Jurryhill	ryanseekin
califman4luv	kenpark32	SchweetMixed
Caresforualways5	kevin1b2c	seeking4love52
caringprat	laser786	seekingyou521
codedtunes4uonly	Lastnightlov	seekinrichard2
cole0192	lonelyheart2330	seeklifepart9075
cool4uall	looking_wide	simslove9993
CoordinatedOat2	love2u45heart	singleman22242
CoordinatedOatIO	lovemartinz	skypassionateluv
CoordinatedOatMI	loverman7812	Sonew2010
cracklove00	Lurky_Hearted11	soulseeker9527
davidmmm50	LUV_IS_WAT_I_	sprint300
derickcares	NID	stareaturluv5725
deslipn	Mark20112love	superlover2628
dinnerknigth	Mark27662C	theheartseek27
eric4063	Markeasyheart	thomas01170
george50009	MEANDYOU4EV	TIMETOLOVE55
greg8086	ER01	Trustme4love000
gthomas0908	melooking4uinky	up2josh
gudheartman49	merlin49641	waitforme0v3
hand2hold12	michael8596	wecanmakeit05
happyending5111	miguy4u1226	Wittyspousetmn
happyman11vs	morningbless20	youtoodo099
heartseek4luv	morninggood21	zain1274
heavyhearted66	mrjustin4eva	zian22
hintgroove	nattysmiles22	
honestlover11294	NormalBid	

Angel4814	Bunny4195	Fairy83123	Kitten8452
Angel6761	Bunny4450	Fairy83253	Kitten8491
Angel23148	Bunny4462	Fairy84951	Kitten8495
Angel38472	Bunny5341	Fairy93021	Kitten8757
Angel38746	Bunny5486	Gentle_charm456	Kitten9005
Angel39551	Bunny5492	Gentle_charm2134	Kitten9304
Angel47354	Bunny5832	GentleGirl6246	Kitten9841
Angel48158	Bunny5852	I_love43256	Kitten12722
Angel48361	Bunny5848	Kindlove534544	Kitten28191
Angel48562	Bunny6273	Kiss1331	Kitten31253
angel53633	Bunny6513	Kiss2355555	Kitten38218
Angel65332	Bunny6987	Kisss2132	Kitten38412
Angel72731	Bunny7079	Kiten6537	Kitten38459
Angel97895	Bunny7321	kiten542646	Kitten38492
angrl65753	Bunny8425	kiten984867	Kitten38595
Blonde1370	Bunny8498	Kitten0546	Kitten46732
Blonde1814	Bunny8559	Kitten1638	Kitten48549
Blonde2573	Bunny8903	Kitten2434	Kitten49502
Blonde3581	Bunny9303	Kitten2623	Kitten49503
Blonde4356	Bunny9258	Kitten2957	Kitten78518
Blonde4574	Bunny84932	Kitten3452	Kitten83245
Blonde5811	Charming_angel73	Kitten3849	Kitten84056
Blonde5890	Charming_love120	Kitten3899	Kitten87409
Blonde5906	Cins314132	Kitten4467	Kitten93945
Blonde7459	Darling3211	Kitten4533	love_angel21341
Blonde7498	Fairy0405	Kitten4682	love_angel34125
Blonde7540	Fairy0406	Kitten4859	Love_kiss2341
Blonde7646	Fairy0465	Kitten4892	Milinsi5161
Blonde8315	Fairy0567	Kitten4983	Mins11
Blonde8395	Fairy1462	Kitten5292	mins21412
Blonde8402	Fairy1549	Kitten5409	pussdis35673
Blonde8450	Fairy1597	Kitten5445	Pussik1122
Blonde8492	Fairy3021	Kitten5495	Pusssi4315
Blonde8501	Fairy3672	Kitten5498	Snsir6t3426
Blonde8502	Fairy4831	Kitten5596	Sunshine18231
Blonde8503	Fairy4893	Kitten5631	Sunshine32455
Blonde8505	Fairy4983	Kitten5643	Sunshine38956
Blonde8533	Fairy5337	Kitten5668	Sunshine41594
Blonde8549	Fairy5431	Kitten6518	
Blonde8956	Fairy6517	Kitten6548	
Blonde9105	Fairy6553	Kitten6569	
Blonde9301	Fairy7631	Kitten7330	
Blonde9303	Fairy8302	Kitten7398	
Blonde9472	Fairy8394	Kitten7468	
Blonde84905	Fairy8397	Kitten8201	
Bunny0352	Fairy8921	Kitten8204	
Bunny0920	Fairy9409	Kitten8273	
Bunny3325	Fairy9495	Kitten8354	
Bunny3571	Fairy83011	Kitten8442	

alisonjones851	gorgeous4luv	Shany81Burg
Amusinglov	Happiness3620	Shany_81Tikki
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Angel_ok81BurhQQ	honunh5	Singularity7061
Annete1727	Hope84Love	Smile_Happin5641
Apolka	Juicy_valley7922	Smile_rose7489
Apolka_Cloud81QQ	Kiss_of2an_angel	Smile1065
Apolka_Lo81QQ	Light_of_lif2220	Snowqueen6040
Apolka81GQ	lightWpleasure	Star_Burns936
Apolka81Shin8788	Life_Caress	Star_Dust6053
arrow_cupid	long_awaited235	Star_Sky8902
Beam_of_love	LoV_Ken	Starlit_night3
beautiful_gir932	love_book	Strawberrysw2464
Beautiful_per366	love_is_love2	success_in_love
best_night	love_stores	Sun_Q_Q81
Blackpear8997	Lunar_dawn	Svet_Deg
BrightOsunO	Magnificents3486	Sweet_Cherry6897
camomile_glory	Mellowsweet_girl	Sweet_kiss8913
City_of_love1	Mostunusualkiss	Sweet_kiss9718
Cloud_81JQL	MushyPrinces	Sweet_pleasu2707
contact_passion	Music_Happin23	Sweet_raspberry
cream_pie	night_love4	Sweet6kiss
dancelWlove	night_of_love	Sweetkisscat
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Decline_Water	paradise_desire	Tenderness4oflov
DeepCrumb	paradise_two	Tenderness8779
Desired_eyes	Passionateki7995	Tendernessoflove
destiny_solves	Peach8068	ThemostgentleW
DevotedTis	Perfection_desir	True8801
favourite_person	pink_panther2176	whirlpool_eyes
first_night75	place_love781	
FirstRipe_fruit	place_love9177	
Flower_81Q	Pleasant_pie2907	
flower_life8357	pleasant_ple3462	
Flower1of_love	pleasure_love	
Gentle_Kiss	Precious_tender	
Gentle_Kiss1564	Rafaella6827	
gentle_love3896	Red3rose	
Gentle_Taste1839	Romanticism5607	
Gentlechocol4141	Satura_81QoLL	
Gentlekiss831	Satura_Lov	
girl_like	secret_girl3496	
good_luk	Shany_81Roxburh	



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amfox93907	horac07463	slife72032
amfrs85251	huusq23452	stolt91101
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bitar95240	jobug50219	vined28144
cowav64155	johen08873	xtnol79424
daffn94132	jpqta49855	
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daisy78756	karla32926	
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ebque53032	nnkay98499	
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farle95351	pagel41164	
Floret68454	pavyq60634	
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grabe36532	roose68133	
grenk36526	ryzam77040	
grumb08873	scall84005	
gwend92629	schef98597	

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86yfv	macary7	schock3f
Anemuha	maceda2330	schock3f1556
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baracianh	necaise60	sevanowwy
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belirolly	netandi5	strategh
berMarPl	neyqtevie3	sulikl0
blayony	Nlamonurra	TabetaJOG
byaroleety	noffhv8	tassey6
cerva936	nosetuda	telemass
cimalian2	nucilla	tiriusarb
cornelu905	obeledda	tohojlis
dalurera3	onville1	tokody456
dukula54	pahillly	unottela
durnfo	parosaka	ureyany96
ellebra	pervineju	UselaGee
ElinoV77	pitcock4	vagazena
eruza324	poisona5	velakeh7
fdsa6413	polacok5	voba5fas
fridJes15	porecusa	vohoroca
from2000	ProSona9	welljRma
gabrikka8374	Puferita	weryXTVe7
ghezzoa7543	QGFrehN	winelsa9
glp159	Rabetohy	wsMulMai
godulisa7	rashdi04	zellhva
gytenall	relesdu	
hunotela	renashoma	
ibecke6302	reneenn5396	
ickucu9	retise534	
ilisocy6	riteputy	
joldene7	roberasa	
kegaryta	roCham3	
kenaulka	rodeen9	
kessicoka	rokasa7	
kiraflower9809	rotehesa	
kisonass	ruvisina	
konssey4	sammakyt	
kynera111	SanAshb9042	
liposena	Sanazada	
loborama	sansessa	
lorado272	sasla4k	

Agape2379	Looking_of_love
Alive3917	Loveis2792
Angel_eeper	Lovely7194
Angel8051	Lucky_find1626
Angel8390	Magic_passio8746
Baby4568	MeekNice
beauty4043	Narcissus2547
Berrysweetflower	Passionate_cherr
bethalyn7809	Pleasure1793
butterfly2398	Pussycat7195
butterfly6157	Rainbow6555
butterfly8403	Ray_of_light25
Care9481	Red_light4276
Charm1532	Rose6855
Charm1587	Shine2592
Delight7129	Smartfigure
Dream5645	Smile_happin8785
Exotic3108	Snow_lady8526
Figgy_Sweet	Snow_queen2853
Fire_love5068	Snowflake3565
Gentle_Rain4580	SnowsnowW
goddess2546	SnowwhitesmileW
goddess6586	soon2048
goddess6680	Strawberry6378
Greater_love1452	Success9571
Happiness0845	Successfulsnowfl
Happiness3697	sun1590
Happiness5194	Sunset5560
Heavenly_olor	Sweet_berry4595
Hope5081	Sweet4596
HotHeart92662	Sweet8258
HotLovely_caress	Sweetcherryawood
IceBaby6095	Sweekiss9072
Instant_passion	Sweetleaf6574
Irresistable6840	Sweety5741
Juliet3798	Tenderness458
Kristydd	ThequietseaW
Lady5430	Treasure4268
lets_talk1463	White_snow5029

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andsberry	poitel11
aransa7178	polako11
arlintondy	polissee
balasco494	pyanokidi
balsige4	quave8f
bauhma	radunela1
biggara7	ranila888
billeva789	ritory44
brylabp5	schakela5
burgne	schweda9572
cesena608	shirey7
charm858	storeyg1
chestnut777	sumida9
cicasho1217	svinth77x
claboo8	tilana2
cowie475	VelKortn1
croncel	vimet0
curanax2	waufol23
dialordy	westruma
fosnouga	woderawa
gabrisen2	
hempto	
hirale9	
hudinoka	
jugassa	
kibe3e6	
kowkito108	
kuzialry	
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letchawp3	
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nedesa4	
Nikkki6982	
nmrtn9	
nochi54	
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10ve\_for\_you  
 lady\_little  
 lady\_d011  
 lady\_f0r\_you  
 lady\_f10ver  
 lady\_golden\_bird  
 love\_forever291  
 love\_life1254  
 love\_rising  
 lovely\_dreammm  
 lovehoney1233  
 lovely\_dream541  
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 1st\_10ve  
 A10ne\_nice\_cat  
 Black\_r0se  
 Baby\_d011  
 c0me\_t0\_me  
 Destiny\_10ve  
 Female\_A1one  
 female\_good  
 G00d\_life  
 Great\_10ve  
 I\_love\_life  
 Kiss\_t0\_you  
 Lady11\_love11  
 Laverr1love1  
 my\_10ve  
 Nice\_10ve  
 Nice\_f10ver  
 Open\_f0r\_10ve  
 Open\_f0r\_love  
 Pure\_10ve  
 red\_r0se  
 Ren011girl1  
 R0se\_lady  
 rossey\_01daw  
 Seeking\_10ve  
 Single\_soul  
 Small\_kitten  
 Soul\_of\_destiny  
 Soul\_mate243  
 Spring\_soul  
 Sweety\_soul  
 W0man\_love  
 W0man\_f0r\_soul  
 W0nder\_heart82

Amendmyheart7798  
 austinbrettachic  
 brettaforce  
 caligurl8721  
 ChoosenMate2011  
 cuddlebear906  
 cutemamanian  
 daintysoffie123  
 egim25atyahooooo  
 egim38atYahoo  
 fran\_0000  
 gbollylady  
 joyme49atyahoo  
 joyme74atyahoooo  
 Justonelove1234  
 Lady\_of\_love2u  
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 loveconfession30  
 Loveconfession987  
 Mjoy77atyahocom  
 MychoosenMate001  
 Mychoosingmate11  
 Myheartseeksllove  
 Myhero2011  
 nolashw721  
 ShyATfirst2011  
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 sweetgem008  
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 sweetlinda770  
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 sweetmercy790  
 sweetsharon980  
 vanny4u1986

50thdecluv  
 Appreciatemaluv1  
 BestSeeking4True  
 ChangeTracy  
 Clear\_Road12  
 dorattybeauty13  
 Endowedlady43  
 Endowednewlove  
 Feelin\_u\_Babe  
 Franciscalykeme1  
 Free\_Oct67  
 Funlovingurl09  
 ijeluve212  
 indiansexybabe24  
 KaySiviaCiscaluv  
 leosexy90  
 LifeNaGaga  
 Loveaffar  
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 Meluvlyme92  
 mercyluv121  
 MissCiscaluv12  
 MissEndowed4U  
 MissEndowedCisca  
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 Olahun2suregurl  
 Pepper4chic14  
 Rideonmeluv99  
 Salemluckymi  
 searchin4him121  
 seekerluv\_120  
 Seeking\_Babe74  
 Seeking4U34  
 Sexy\_Luv123  
 sexymercy234  
 showsomeluv23  
 Vastdoubleluv  
 Yeslovelybabe

Alyshaffy  
 Brendanemy  
 Carsewax  
 deferache  
 Diana2191  
 Emilimmy  
 Emilsetta  
 Emilysca  
 Emmaneffy  
 HandyLily  
 Jennifer6203  
 Jennifer9636  
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 lexeresia  
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 Lily8367  
 Lily8741  
 NarrowLily  
 natefenia  
 NiftyLily  
 Panther8603  
 PrincessWhistle  
 PunkinLily  
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 Sneginka4330  
 Swallow574  
 Tremendous\_Lily  
 Tristapala  
 Uneven\_Princess  
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 Yagotka5230  
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 Bertie42743H  
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 Darcy95202H  
 Elnora89197B  
 Eve36184H  
 Fetlangel  
 Gwendolyn347E  
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 Kimberley2700B  
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 readyforlove1010  
 rose9283  
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 Sherrylovesyou00  
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 Terry56996J  
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 vicky11223

Affectionate3536  
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 Beautiful34652  
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 firstlady8853  
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 Rebeca8526  
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 sun2334  
 Sweetty4576  
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 VerinSquire43

juana7543  
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meri9741  
merian7643  
mihel5635  
moli6543  
sara8769

Chocolate4787  
Darling36476  
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dearest36346  
dearest45336  
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honest55765  
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